

# Exhibit B

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STEVEN G. MILLETT,

MELODY, J. MILLETT,

On Behalf of themselves

And all others similarly situated.

Plaintiffs,

vs.

No. 05-599-SLR

TRUBLINK, INC.,

A Trans Union Company,

Defendant.

VOLUME I

DEPOSITION OF MELODY J. MILLETT, a  
Plaintiff, taken on behalf of the Defendant  
before Nissa M. Sharp, CSR, CCR #528, pursuant  
to Notice on the 3rd of May, 2007, at the  
offices of CLOON LAW FIRM, One Hallbrook Place,  
11150 Overbrook Road, Suite 350, Leawood,  
Kansas.

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APPEARANCES

Appearing for the Plaintiffs was MS. B. JOYCE YEAGER of YEAGER LAW FIRM, LLC, City Center Square, 26th Floor, 1100 Main Street, Kansas City, Missouri 64105.

Also appearing for the Plaintiffs was MR. BRYSON R. CLOON of CLOON LAW FIRM, One Hallbrook Place, 11150 Overbrook Road, Suite 350, Leawood, Kansas 66211.

Appearing for the Defendant were MR. MICHAEL O'NEIL and MS. HEATHER SCHUMAN of DLA PIPER US, LLP, 203 North LaSalle Street, Suite 1900, Chicago, Illinois 60601-1293.

Also present was Leda Gipson of MCR VIDEO.

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Examination by Mr. O'Neil

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1 question is you don't know who Mr. Perez is.

2 Q. Uh-huh. So, as I think you mentioned  
3 before, you know, your lawsuits involve a number  
4 of things, one of them is dissatisfaction with  
5 the defendants' products, you know, when it  
6 comes to Experian, TrueLink, and Equifax, right?

7 A. I'm sorry, can you please reread the  
8 question?

9 Q. I'll withdraw it. You mention identity  
10 theft, do you remember?

11 A. Yes.

12 Q. Okay. And that's kind of what prompted  
13 your investigation, your purchase of products  
14 and then the lawsuits, right?

15 A. Well, we had identity theft, yes.

16 Q. And to be more specific, what you were  
17 referring to there is that somebody apparently  
18 named "Mr. Perez" was using your husband's  
19 Social Security number, right?

20 A. Yes.

21 Q. Okay. Have you ever been a victim of  
22 identity theft?

23 A. I have been a victim of data breaches,  
24 but I don't necessarily know that my particular  
25 identity has been stolen. But, you know, given

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1 lead in investigating the misuse of your  
2 husband's Social Security number?

3 A. Yes.

4 Q. Okay. Is it fair to say that you took  
5 the lead in ordering file disclosures from the  
6 credit bureaus for your husband?

7 A. Yes. As his agent, I ordered those  
8 file disclosures.

9 Q. And were you his agent for disputing  
10 information with the bureaus regarding his  
11 credit file?

12 A. Yes, myself and Mr. Adler, and of  
13 course his other legal counsel.

14 Q. And were you also his agent for  
15 ordering products from TrueLink and Equifax and  
16 Experian, right?

17 A. Yes.

18 Q. And you were also his agent in  
19 answering the interrogatories that were directed  
20 at him, right?

21 A. Yes.

22 Q. And that's because -- isn't that  
23 because -- is one reason for that is because you  
24 thought you knew the information better than  
25 your husband?

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1 agreement that you get for every single piece of  
2 software you ever install from top to bottom?

3 Q. I don't generally answer questions in a  
4 deposition, but I'll tell you no. I don't. But  
5 you know what, if I'm going to sue somebody on a  
6 class-wide basis for it, yeah, I'm going to read  
7 it.

8 MS. YEAGER: I'm going to object  
9 to the --

10 Q. (BY MR. O'NEIL) Are you seeking any  
11 money for you and your husband as part of this  
12 settlement?

13 A. Well, I believe there would be  
14 statutory relief under the Kansas Consumer  
15 Protect Act, and I believe there would be the  
16 matter of the contract breach and the fees paid  
17 on behalf for the product that is the subject of  
18 the breach.

19 Q. So, you want the money back that you  
20 paid for the products that you're not satisfied  
21 with, is that right?

22 A. Yes.

23 Q. Do you want all the money back?

24 A. Well, yeah. For the class, yes, of  
25 course.

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1 Q. Well, right now I'm just asking about  
2 you, we'll get to the class. Do you know how  
3 much money you've paid TrueLink over the years?

4 A. I'm sure it's in one of those documents  
5 somewhere that I've seen.

6 Q. I haven't seen it, but.

7 A. I believe it was in your production,  
8 it's the order management screen that's got all  
9 the transactions on there.

10 Q. And do you want all -- do you want the  
11 court to order that TrueLink must deliver all  
12 that money back to you?

13 A. Well, I believe I've heard the legal  
14 term referred to as "disengorgement," is that  
15 how that works? When you make false claims and  
16 entice people to buy something under false  
17 pretenses, that you don't have the right to keep  
18 the money that you've made as a result of those  
19 false assertions, is that how that works? I  
20 think.

21 Q. Is it your understanding that you  
22 brought a claim for disgorgment against  
23 TrueLink?

24 A. It's my understanding that the class  
25 will get some kind of relief for the products.

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1 that they purchased that did not work. Now, how  
2 much relief that is or is not is a determination  
3 for the court to make or as a result of any  
4 class action settlement, should there be one.

5 Q. Well, you would agree that there's some  
6 value to the products that you've purchased from  
7 TrueLink, right?

8 A. Well, I mean, the value that exists for  
9 the product only exists in the fact that you're  
10 viewing your consumer disclosure online. That,  
11 you know, there's a convenience value in that  
12 aspect of it. But it does not perform as it's  
13 advertised to perform in the fact that it does  
14 not provide complete protection from identify  
15 theft. It doesn't even provide basic protection  
16 from identity theft.

17 Q. Have you canceled the subscription that  
18 Mr. Millett has with TrueLink for credit  
19 monitoring?

20 A. I believe so. It's been canceled now.

21 Q. Okay. And when did you cancel it?

22 A. I believe it was allowed to expire and  
23 lapse, and the credit card that's in there was  
24 expired and so you -- they have not been able to  
25 place a new charge. So, I believe it lapsed in

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1 and of its own accord. It's not like I called  
2 somebody to cancel it.

3 Q. So, when did that occur?

4 A. I think the last charge was in November  
5 of 2006 and there hasn't been one since.

6 Q. Why didn't you make effort to give a  
7 new credit card so you can continue the credit  
8 monitoring service?

9 A. Because there's no purpose in it.

10 Q. When did you come to the conclusion  
11 that there was no purpose in purchasing the  
12 credit monitoring service from TrueLink?

13 A. Well, I mean, it's been some time over  
14 the course of the litigation. But, I mean, now  
15 that I know that it really doesn't even cover  
16 for anything, then there was just no point in  
17 it, so I've discontinued it.

18 Q. And when did you learn that?

19 A. Like I said, that's been a evolving  
20 process as new evidence has arised in this case  
21 as we've gone along. But, I mean, there have  
22 been little things. But, I mean, getting the  
23 information, for example, that the -- that the  
24 -- I'm drawing a blank here for a moment -- that  
25 the Home Depot account had been relabeled and

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1 that that information was still not presenting  
2 in the product. The fact that we had had false  
3 alert triggers on and off throughout 2005, I  
4 believe was the year that those were occurring  
5 in. That it serves no purpose, so I just  
6 discontinued it.

7 Q. Prior to November of 2006, you  
8 discontinued it?

9 A. No. I didn't renew -- the last charge  
10 was in November of 2006, and I've not placed a  
11 new credit card in there.

12 Q. Was November 2006 when you came to the  
13 conclusion that there was no purpose for  
14 purchasing the credit monitoring service?

15 A. No. It was when I made the conscious  
16 decision to go in there and end it. TrueLink's  
17 monitoring service is a negative opt-in. You  
18 must specifically opt out or the subscription  
19 continues automatically through no interference  
20 or whatever of your own.

21 Q. Did you ever cancel it affirmatively?

22 A. What do you mean affirmatively?

23 Q. Meaning what you just said, that you  
24 called TrueLink and said cancel it?

25 A. I already answered that, and I said no.

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1 I allowed the subscription to lapse by not  
2 giving them a new credit card number with the  
3 correct expiration date.

4 Q. Because you told the "New York Times"  
5 reporter that there was some value to credit  
6 monitoring, right?

7 A. I told the "New York Times" reporter  
8 that it was the best tool available, but it was  
9 not as advertised.

10 Q. Right. And that you had continued to  
11 purchase the product, right?

12 A. Well, you still have to be able to look  
13 at your credit report, sir.

14 Q. Okay. So, when you had the  
15 conversation with the reporter for the "New York  
16 Times", you still thought that there was value  
17 in the credit monitoring service, right?

18 A. Not the monitoring service. There is  
19 value in having access to your credit report on  
20 an ongoing basis, especially when you already  
21 know you're a victim of identity theft.  
22 However, it is not complete identity theft  
23 protection as is advertised.

24 Q. Is that what TrueLink advertises?

25 A. I believe that's what was on their

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1 Q. You didn't send it, right?

2 A. No, I did not.

3 Q. Okay. And you never called TrueLink  
4 and said I was expecting to see accounts  
5 relating to Mr. Perez on my husband's credit  
6 file and I didn't see it? You never made that  
7 call to TrueLink, did you?

8 A. No, I didn't.

9 Q. Did you -- strike that.

10 I'm going to show you an exhibit,  
11 Mrs. Millett.

12 (M. Millett Exhibit 9 was marked  
13 for identification by the reporter.)

14 Q. (BY MR. O'NEIL) Mrs. Millett, I'm  
15 showing you what's been marked Exhibit No. 9,  
16 which I -- which I'll represent to you is the  
17 complaint that was filed in the district -- in  
18 the federal court in the District of Kansas on  
19 behalf of you and your husband suing the seven  
20 companies that you identified previously.

21 A. Yes.

22 Q. And you saw this before it was filed,  
23 right?

24 A. Oh, yes.

25 Q. And you made sure that it was accurate,

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1 husband from each of the three major credit  
2 bureaus, do you recall that?

3 A. Yeah. I also requested Abundio Perez's  
4 credit report too.

5 Q. Yeah, and you didn't get that, did you?

6 A. No, I did not.

7 Q. But you did get some information from  
8 TransUnion that was helpful in your  
9 investigation of Mr. Perez's misuse of your  
10 husband's Social Security number, right?

11 MS. YEAGER: Objection.  
12 Foundation.

13 A. I don't recall providing somebody a  
14 list of accounts that tells you that you need to  
15 dispute with each furnisher exactly helpful.

16 Q. (BY MR. O'NEIL) Okay. So, you didn't  
17 get any helpful information from TransUnion? Is  
18 that your testimony?

19 A. No, that's not the testimony. I got  
20 information from TransUnion. The information  
21 was not helpful because the information did not  
22 contain the account numbers for the accounts in  
23 question, which meant I every time I called one  
24 of those furnishers, I had to go through three  
25 days of agony, pain and whatever just to try to

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1 get to the bottom of what accounts he actually  
2 had for those furnishers. And, in some cases,  
3 those furnishers had five, six, seven, eight or  
4 nine different accounts associated with them,  
5 and it would have been helpful to know that  
6 information.

7 Q. What -- how did you get the information  
8 regarding what furnishers to contact?

9 A. I got that information from the TU  
10 letter. But that required the retainer --  
11 retention of a lawyer and \$1,750 worth of legal  
12 fees to get that letter.

13 Q. Well, how do you know that?

14 A. What?

15 Q. How do you know that you had to get a  
16 lawyer before you could get the information from  
17 TransUnion?

18 A. Because TU didn't give me that letter  
19 in January when I called. They didn't give that  
20 -- give me that letter until Adler sent them a  
21 letter intending to sue in April of 2003  
22 certified mail.

23 Q. So, if you testified elsewhere that the  
24 information from TransUnion was helpful, would  
25 that have been false testimony?

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1 A. No.

2 Q. Oh, okay.

3 A. The information was somewhat helpful,  
4 but, you know, I don't -- you're trying to  
5 characterize it as, you know, TransUnion is  
6 being altruistically helpful, and they're just  
7 giving this information to me of their own free  
8 will, and I don't see it that way.

9 Q. I don't think that's what I asked you,  
10 but. Let me make sure I understand. The  
11 information was helpful in investigating  
12 Mr. Perez's misuse of your Social Security  
13 number; isn't that correct?

14 A. Yes, the information was somewhat  
15 helpful, yes.

16 Q. And TransUnion didn't charge you  
17 anything for that information; isn't that  
18 correct?

19 A. TransUnion didn't charge me anything  
20 for the information?

21 Q. Right.

22 A. No, TransUnion did not charge me  
23 anything to send that letter, but it cost me  
24 money.

25 Q. The letter cost you money?

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1 A. Sure it did. I didn't get any  
2 information from them until I hired a lawyer who  
3 threatened to sue them.

4 Q. And was this threat in writing?

5 A. I believe Adler sent letters saying  
6 that he was going to be seeking legal action if  
7 they did not respond and provide the  
8 information, so at that point the letter was  
9 provided.

10 Q. And TransUnion provided the information  
11 that Experian and Equifax refused to provide,  
12 right?

13 A. I had not gotten a similar letter from  
14 Equifax or Experian at that point, no.

15 Q. Well, you've testified before that when  
16 Mr. Adler made the same request of Experian and  
17 Equifax, that they refused, right?

18 A. They did not provide the information,  
19 yes.

20 Q. Okay. And that testimony was accurate  
21 when you testified previously, correct?

22 A. Yeah.

23 Q. Okay.

24 A. Uh-huh.

25 Q. Let me show you what's been marked

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1 A. I don't know. I haven't looked the at  
2 it in probably ten years, so I don't even know  
3 if it's still on there or not. It's been quite  
4 a while.

5 Q. I'm not asking if it's on there. I'm  
6 asking what was the statement that you asked  
7 that TransUnion put on your file?

8 A. It's very similar in nature to this,  
9 but I don't know the exact wording because I  
10 haven't looked at it in ten years.

11 Q. I won't ask you for the exact wording.  
12 But what -- so you claim to be a victim of  
13 identity theft ten years ago?

14 A. No. It was not identity theft. I was  
15 having problems with an ex-husband.

16 Q. Okay, well, you said it's the same as  
17 this, and this says, quote, "My identifying  
18 information may have been stolen." That's not  
19 what your statement says?

20 A. It's a consumer statement, so it's the  
21 same as this.

22 Q. Okay.

23 A. It's in the same box on the credit  
24 report.

25 Q. The consumer statement has a phone

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1 split. Fraud alerts do not work." where did you  
2 get that information? Or where did you get the  
3 information that lead you to that conclusion?

4 A. That was much later.

5 Q. Okay. And that was -- what information  
6 did you get that lead you to that conclusion?

7 A. Like I said, you know, in dealing with  
8 the investigation and talking to the different  
9 furnishers over time, some of the furnishers in  
10 question Steve Millett already had a fraud alert  
11 on file and they were still receiving  
12 information from the credit bureaus obviously on  
13 Abundio Perez on active accounts, and they still  
14 has not received Mr. Millett's fraud alert.

15 Q. I understand now. So, turning to the  
16 second document, after you got this information  
17 from TransUnion, you started contacting each of  
18 the data furnishers that TransUnion identified  
19 for you, right?

20 A. Right.

21 Q. And it was during the course of those  
22 phone calls that you learned the information  
23 that lead you to believe that files are split,  
24 fraud alerts do not work?

25 A. Right.

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1 Q. Okay.

2 A. Because I talked to -- for example,  
3 we'll just take for an example on here, Chase,  
4 NA. This guy, Chase, Chase Mortgage, and --  
5 Chase, NA, Chase Mortgage and then there's  
6 another Chase, Chase had three accounts, a  
7 mortgage, a car payment and a credit card. Neal  
8 had a three-in-one credit report for Abundio  
9 Perez.

10 Q. Neal?

11 A. That's the guy I talked to.

12 Q. Okay.

13 A. And he had three-in-one credit report  
14 for Abundio Perez, and he specifically told me  
15 that your fraud alert does not appear anywhere  
16 on there.

17 Q. And when did you start making these  
18 phone calls to all the data furnishers listed on  
19 the April 23 letter?

20 A. Would have been some time on or after  
21 maybe April 26 or so, because the mail three  
22 days, you know, bring it home, lay it on the  
23 counter for a day and then you go open it up and  
24 go -- because I thought it was another credit  
25 report and, you know, you get nine, 10 credit

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1 reports in the mail, they were piling up or  
2 whatever. I work on them when I can.

3 Q. But then after you finally opened them  
4 up, that's when you started making all these  
5 phone calls, right?

6 A. Well, first, I looked at this and I  
7 didn't know what to do, and the first phone call  
8 I made was to the Foleys at the Identity Theft  
9 Resource Center.

10 Q. Okay. And do you recall anything about  
11 that conversation?

12 A. I mean, it was just a general  
13 conversation. I was freaked out. Linda and Jay  
14 are particularly good at calming down. They  
15 provide, you know, victims assistance,  
16 counseling, support, that kind of thing.

17 Q. Who are Linda and Jay?

18 A. Linda and Jay Foley? At the Identity  
19 Theft Resource Center.

20 Q. Oh, okay.

21 A. Yeah.

22 Q. I don't know them. But soon after  
23 April 2003, when you first started making these  
24 calls at the end of April 2003, you determined  
25 that there was separate files for your husband.

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1 and for Mr. Perez, right?

2 A. Well, that was the assumption. I  
3 didn't have concrete proof of that.

4 Q. Understood.

5 A. Yeah. Because obviously none of this  
6 information had ever been on our file or we  
7 would have called somebody and disputed it.

8 Q. Right. And some of the data furnishers  
9 are saying, well, we got credit reports from  
10 Mr. Perez and there's no fraud alert there,  
11 right?

12 A. Well, not only that, but they couldn't  
13 understand how they had gotten the credit report  
14 for Mr. Perez when Mr. Millett had a police  
15 report and a Social Security card with the  
16 actual number that was being used.

17 Q. Now, by my count, there's 28 different  
18 furnishers identified on the April 23rd letter?

19 A. Yep.

20 Q. And you got even more information about  
21 the particular accounts that each furnisher had  
22 with Mr. Perez, right?

23 A. That's correct.

24 Q. Okay. To your knowledge, had any of  
25 those accounts showed up on your husband's

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1 credit file?

2 A. The accounts themselves?

3 Q. Yes.

4 A. Not on the consumer disclosure, but I  
5 don't know that they're not hidden in the master  
6 file.

7 Q. Okay. Aside from your suspicion that  
8 there is something being hidden by TransUnion,  
9 you don't have any evidence that these accounts  
10 were actually on Mr. Millett's file, correct?

11 MS. YEAGER: Objection.  
12 Foundation.

13 A. I don't know. I think inquiries count  
14 as being on someone's file. So, I mean, to the  
15 extent that inquiries are also disputable  
16 information, I mean, if you want to be  
17 technical, no trade lines have ever appeared.

18 Q. (BY MR. O'NEIL) Okay. What was your  
19 husband's reaction -- your husband never dealt  
20 with the bureaus, right, directly?

21 A. Well, at that point in time, my husband  
22 was too -- too angry to properly deal with  
23 anybody.

24 Q. Oh, that's why you assumed the  
25 responsibility?

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1 Steve assumes a subservient role. I mean, he  
2 and I are partners in everything. I mean, to  
3 me, the term "pants in the family" means like  
4 I'm in charge and he does what I say, and that's  
5 not how it is. We do a lot of things together.  
6 Each of us have their own specialties and things  
7 that we're good at, and those that are good, do,  
8 and those that are good at other things, do  
9 other things.

10 Q. (BY MR. O'NEIL) So, do you recall  
11 explaining to your husband what you had learned  
12 after you got this information from the credit  
13 bureaus and the furnishers? Did you explain to  
14 him at that time, I'm guessing this is in May of  
15 2003, that Mr. Perez has opened up numerous  
16 accounts using his Social Security number?

17 A. Well, I believe we had the discussion  
18 in April when we first got the letter before I  
19 even started calling, but by May and possibly  
20 the beginning of June, we were aware that each  
21 one of these furnishers in some cases had as  
22 many as five, six, seven, eight accounts.

23 Q. Uh-huh.

24 A. So, I mean, you know, it's not 28  
25 accounts, it's 26 credit cards, 11 automobile

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1 A. That's correct, yes.

2 Q. Okay. And then you've got other claims  
3 that say and then after I discovered this  
4 identity theft, I bought credit monitoring  
5 products and they didn't work, right?

6 A. Correct.

7 Q. The only claims you have left against  
8 TrueLink are those latter claims that the  
9 product didn't work, right?

10 A. That is correct. But to the extent  
11 that the product sits on top of the data, the  
12 fact that the bureau is or is not providing you  
13 all of the data or whether or not it's providing  
14 to you and you're not providing it to me, I  
15 think that's relevant to TrueLink's claims.

16 Q. What data has TrueLink not provided to  
17 you that you believe they should have provided  
18 to you?

19 A. Public record judgements were filed  
20 with my husband's Social Security number in 2004  
21 while we were subscribed to the product that  
22 were not notified in the product. In addition  
23 to that, there were credit accounts belonging to  
24 Abundio Perez over 2004 and 2005, most notably  
25 which would be the Home Depot account and J. C.

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1 Fenney's account, and then later the CB USA,  
2 Citibank USA account that were relabeled to  
3 Steve Millett's name and address and/or  
4 variations thereof that were never alerted in  
5 the product.

6 According to your own documents which  
7 you've supplied, the actual credit monitoring  
8 subscription itself as registered with TU was  
9 allowed to fall off and lapse for well over  
10 three months before it was finally restored and  
11 put back on while you were charging us.

12 And in the meantime, the product  
13 proceeded to produce blank alerts which would  
14 tell you you have an alert, something's changed  
15 in your file. You would go into the product,  
16 click on the web link, the alert would come up  
17 and be a completely blank white box with nothing  
18 in it. And I had just used my quarterly credit  
19 report from the product, because the product  
20 only gives you one report quarterly, and I would  
21 be forced to buy a new report thinking it was  
22 going to show me some change, and then there was  
23 nothing. It matched the report I had just  
24 opened two weeks ago from my quarterly allowance  
25 and I had just -- now I'm out 9.95.

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1 Q. Any other complaints that you have  
2 against the TrueLink product?

3 A. I'm sorry, I'm thinking.

4 Q. Take your time.

5 A. Yeah, my other complaint on the  
6 TrueLink product would be that the product is  
7 being marketed now for bulk purchase for  
8 companies that are now purchasing it to give to  
9 their data breach victims.

10 Q. Are there any other complaints, other  
11 than what you just described, that you have  
12 regarding the credit monitoring service that you  
13 bought on behalf of your husband from TrueLink?

14 A. Well, the lack of notification e-mails,  
15 they could have provided an alert at any time  
16 that said, hey, someone's using your Social  
17 Security number. They don't have to give me  
18 Abundio's file, but they could have said, hey,  
19 your Social Security number appears in six other  
20 people's credit reports. I think that to me  
21 would be a big indicator that you had a problem.  
22 And it wouldn't violate anybody's privacy.

23 Q. Anything else?

24 A. Notification as to the inquiries. When  
25 soft inquiries are generated, because a lot of

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1 policies? It's on Page 2 of 3 at the top where  
2 it says "Farmers".

3 Q. So, what you're saying then is you  
4 think TrueLink should have told you what  
5 identifying information was used by the  
6 inquirer --

7 A. To generate this inquiry.

8 Q. Okay. Is this just something you wish  
9 they would do or is that something you actually  
10 believed that you would get as part of this  
11 service?

12 A. Well, I would think that if inquiries  
13 were being generated as a result of the Abundio  
14 Perez's information, like the Citibank inquiry  
15 la was that that information would be disclosed  
16 to me. Because it would be an indicator of  
17 identity fraud, and they're promising complete  
18 identity theft protection. So, I mean, the  
19 Citibank USA inquiry that appears on the  
20 TransUnion credit reports from later on in 2004  
21 I believe and 2005 that particular inquiry was  
22 generated -- my husband doesn't have an account  
23 with Citibank and never did. It was generated  
24 as a result of this account that's listed here  
25 on this portion of the TransUnion letter from

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1 VIDEOGRAPHER: It is now  
2 1:43 p.m. and we are back on the record. You  
3 may continue.

4 Q. (BY MR. O'NEIL) Thank you. Good  
5 afternoon, Mrs. Millett.

6 A. Good afternoon.

7 Q. Do you understand that you're still  
8 under oath?

9 A. Yes.

10 Q. Are you aware of any instances after  
11 August 6th of 2003 in which Mr. Perez used your  
12 husband's Social Security number to open up a  
13 new account?

14 A. I believe that there are possible  
15 instances of that, yes. But I have no  
16 definitive proof let's just say.

17 Q. Do you have any proof?

18 A. Well, his house on Pico Street was  
19 refinanced in like the spring of 2005 or four, I  
20 believe, I can't remember which year exactly it  
21 is. And I don't know if that information is  
22 currently being reported under Steve Millett's  
23 Social Security number or not. I know the  
24 number is attached to the file, but I'm not sure  
25 if it was used in the initial credit granting

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1 process. Or that his wife was not the one that  
2 was using the number. So, I mean, that's what  
3 the issue is there.

4 Q. Any other possible openings of accounts  
5 by Mr. Perez using your husband's Social  
6 Security number that you're aware of?

7 A. Judgements that were reported in the  
8 Ford Motor case when Ford Motor obtained a legal  
9 judgement using Steve Millett's Social Security  
10 number, I believe that one was in 2004 as well.  
11 That's when they start calling to collect the  
12 judgement.

13 Q. Ford Motor had a judgement entered  
14 against Mr. Perez?

15 A. Yes.

16 Q. How did you learn that?

17 A. There were two ways I learned about  
18 that. One was through LexisNexis public records  
19 search, and the other one was via phone calls  
20 that were made by Ford Motor Credit to the house  
21 about Mr. Perez's debt that was outstanding.

22 Q. Do you know why -- was Mr. Perez not  
23 paying his bills to Ford Motor? Is that what  
24 prompted the judgement, do you know?

25 A. What prompted the judgement was the

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1 cars were repossessed, and the sell-off of the  
2 cars did not satisfy the note deficiencies.

3 Q. Okay. And the cars were repossessed  
4 because you alerted Ford Motor to the fact that  
5 Mr. Perez had submitted a fraudulent  
6 application, right?

7 A. No, because when I initially alerted  
8 Ford Motor, they took no action.

9 Q. Do you have an understanding as to why  
10 Ford Motor repossessed the cars?

11 A. Yes, because I sent an e-mail to the  
12 CEO.

13 Q. So you prompted the repossession of the  
14 automobiles?

15 A. Yes.

16 Q. Okay. And you also succeeded in having  
17 many of Mr. Perez's credit grantors close his  
18 accounts, right?

19 A. That would be a true statement.

20 Q. Okay. How many accounts do you think  
21 you managed to have closed?

22 A. Well, I know I was successful in a  
23 majority of cases. It's probably easier to talk  
24 about the exceptions than it is to talk about  
25 the ones that were actually closed, because, I

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1 mean, to sit there and try and rattle off I  
2 closed this one or I closed this one, it's  
3 not --

4 Q. That's fine. But your understanding is  
5 that you succeeded in having most of the  
6 accounts that you learned about through  
7 TransUnion's April 2003 letter that they be  
8 closed?

9 A. Some of the accounts were already  
10 inactivated. What I succeeded in doing is  
11 marking them so they could not be reactivated.  
12 But then there were some accounts that were not  
13 closed. And even though the furnishers in  
14 question said that they had been closed, they  
15 did not close them. And then there were of  
16 course some accounts that I did close.

17 I don't know if I'd characterize it as  
18 "most" simply because there's a mixture in there  
19 of different account statuses.

20 Q. So, let me ask you about how you've  
21 been able to remedy the misuse of your husband's  
22 Social Security number. Or maybe put another  
23 way how you were able to limit Mr. Perez's  
24 ability to benefit from the misuse of your  
25 husband's Social Security number. You prompted

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1 Ford Motor to repossess his two cars, right?

2 A. It took six months, but yes.

3 Q. Okay. You were able to have some of  
4 his accounts closed, right?

5 A. Yes.

6 Q. Are you aware of any other consequences  
7 to Mr. Perez resulting from your investigation  
8 of what he had done?

9 A. Yes. He was convicted by the  
10 Department of Motor Vehicles of lying to the  
11 California DMV.

12 Q. Do you know what kind of penalty he got  
13 as a result of that conviction?

14 A. I have no idea. I know that it  
15 originally went up there were like three charges  
16 that were made, I think that was the only one  
17 that was eventually followed through on. I  
18 think they were either dropped or reduced or he  
19 pled guilty or however that works.

20 Q. And have you seen any court records or  
21 police records that indicate the criminal  
22 charges being filed against him?

23 A. I think the record that we received was  
24 like just a partial record of what that  
25 information contained, like there were three

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1 Q. On behalf of your husband, you  
2 purchased certain products from TrueLink in  
3 August of 2003, right?

4 A. Yes, sir.

5 Q. Okay. And have you always been the one  
6 to access the e-mails and the website of  
7 TrueLink on behalf of your husband?

8 A. Pretty much, yeah, uh-huh.

9 Q. Okay. I mean, to your knowledge, your  
10 husband never accessed the website, right?

11 A. Not where he went like by himself and  
12 logged in, no.

13 Q. Okay. And you testified I believe  
14 earlier today that you let the subscription to  
15 credit monitoring lapse in November of 2006  
16 because -- when the credit card was no longer  
17 active, right?

18 A. Correct.

19 Q. Okay.

20 A. But the subscription probably would  
21 have continued on for like three months, because  
22 I think they renew it quarterly. So, you know,  
23 that was the last payment that was made. So  
24 whatever it is, three months or the quarter is  
25 after that date is probably when it expired.

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1 which January, maybe February of '07, I don't  
2 know.

3 Q. Okay. Did you continue to get e-mails  
4 from TrueLink until January or February 2007?

5 A. I got an e-mail from TrueLink yesterday  
6 advertising for me to come back and resubscribe  
7 to the product.

8 Q. Did you continue to get e-mails, credit  
9 monitoring alert e-mails, from TrueLink until  
10 January or February this year?

11 A. Well, they only give you -- send you an  
12 alert if you -- if there's been a change.

13 Q. Okay.

14 A. So, there's not been an alert e-mail in  
15 January or February of '07.

16 Q. When was the last time you got an  
17 alert?

18 A. Oh, it's been I think in December some  
19 time.

20 Q. December of 2006?

21 A. Yeah.

22 Q. Okay.

23 A. When we bought the car.

24 Q. That inquiry prompted the alert; is  
25 that right?

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1 specific question came up of the specific  
2 charges that people wanted the information for  
3 that. So I went out to get the bank records  
4 specifically for this purpose.

5 Q. On behalf of your husband, you've also  
6 purchased credit reports and other products from  
7 TrueLink, right?

8 A. That would be correct.

9 Q. None of those are really mentioned in  
10 your complaint though, do you recall that? I  
11 mean, your complaint is about credit monitoring,  
12 that's the product you reference in the  
13 complaint?

14 A. Correct.

15 Q. Do you -- are you suing -- are you  
16 suing TrueLink with regard to the other products  
17 that you purchased other than credit monitoring?

18 A. I think we've reduced it just down to  
19 the breach of contract for the credit monitoring  
20 TrueLink product, so yes. But, I mean, in the  
21 beginning, I think that we were suing for fair  
22 credit reporting violations which would have  
23 concerned the reports that were involved.

24 Q. And are you suing -- have you ever  
25 purchased credit monitoring for yourself?

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1 A. No. Not that I'm aware of.

2 Q. Okay. Have you ever purchased any  
3 products from TrueLink for yourself?

4 A. I think there was a purchase made for a  
5 three-in-one credit report for myself at some  
6 point in time. But I cannot find the records  
7 that are associated with it.

8 Q. When did you make this purchase?

9 A. I mean, I don't recall the exact time  
10 period. I know that there was a time period  
11 that we bought both reports for my husband and  
12 myself, because we didn't know what was going on  
13 with all of the banking information and  
14 everything was all chaotic. So, there was a  
15 point in time where I had both my report and his  
16 report.

17 Q. From TrueLink?

18 A. Well, from TransUnion. I don't know if  
19 it's TrueLink or not. You know, it's very hard  
20 to delineate that relationship. You know, if  
21 you buy the credit report online and you go to  
22 TransUnion.com, you get a credit report through  
23 TrueLink. So, whether I bought the report from  
24 TransUnion or TrueLink, I don't know. I can  
25 only tell you that I bought a report. Now, I

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1           A.     I only gave you those things which were  
2           in my possession. If it's not in my possession,  
3           I don't know that I'm obligated to produce it if  
4           it's not in my possession.

5           Q.     Do you know what year you allegedly  
6           purchased this three-in-one credit report from  
7           TrueLink on your own behalf?

8                     MS. YEAGER: Objection. Asked  
9           and answered.

10          A.     I would assume it would have to be some  
11          time after March of 2005, because that's when  
12          the website records that I had a new membership  
13          created.

14          Q.     (BY MR. O'NEIL) But in any event,  
15          whether or not -- I mean, assuming that you  
16          actually did buy this product, you're not suing  
17          on that product, right?

18          A.     That's a credit report, that's not  
19          monitoring.

20          Q.     Ma'am, it's really a yes or no answer.  
21          I'll say it again. Regardless -- assuming that  
22          you actually bought this three-in-one credit  
23          report relating to yourself from TrueLink,  
24          you're not suing TrueLink on behalf -- with  
25          regard to that product, right?

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1 A. No.

2 Q. Did you actually get the  
3 interrogatories that TrueLink's lawyers sent to  
4 your lawyer asking about your purchases?

5 MS. YEAGER: Objection. Asked  
6 and answered.

7 MR. O'NEIL: No, it wasn't.

8 Q. (BY MR. O'NEIL) Go ahead and answer,  
9 Mrs. Millett.

10 A. Yes.

11 Q. And did you prepare, physically  
12 prepare, the document that was the response to  
13 the interrogatories?

14 A. The interrogatory -- my  
15 interrogatories?

16 Q. Yes.

17 A. I worked with my attorneys to prepare  
18 those. I didn't physically type them if that's  
19 what you mean.

20 Q. That's what I meant.

21 A. No, I didn't physically type them.

22 Q. You just gave the information to your  
23 lawyers and they prepared it?

24 A. Right.

25 Q. Okay. And did you review the

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1 purchased a product from TrueLink?

2 A. I believe I purchased a three-in-one  
3 credit report.

4 Q. Do you know how much it cost you?

5 A. I can't even say. Maybe 19.95 or  
6 whatever they charge for it. I don't really --  
7 cost wasn't the issue when I purchased it  
8 anyhow.

9 Q. What was the purchase -- what was the  
10 purpose for which you purchased it?

11 A. Just to look at my own information.

12 Q. Did you see any defects in the  
13 three-in-one credit report?

14 A. What do you mean?

15 Q. Did you see any deficiencies in the  
16 product that you had purchased from TrueLink?

17 A. Well, I mean, not on TrueLink's part,  
18 but there were deficiencies in credit furnishers  
19 that had misreported information on my behalf,  
20 yes.

21 Q. Have you ever entered into a contract  
22 with TrueLink?

23 A. Not for monitoring, no.

24 Q. Have you ever entered into a contract  
25 with TrueLink for any product?

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1 more than just tell you how much you owed,  
2 right? I mean, for example, the very first page  
3 of Exhibit 15. That doesn't tell you how much  
4 you're going to have to pay, does it?

5 A. 10.95 per quarter.

6 Q. Okay. Did you read the text on the  
7 first page of Exhibit 15 prior to deciding to  
8 purchase the product?

9 A. Yes.

10 Q. Did you read all of it?

11 A. I read a lot of this, yes.

12 Q. Directing your attention to the very  
13 first page, did you read all of the text on that  
14 first page before you decided to buy the  
15 product?

16 A. Well, like I probably didn't read this  
17 little box down here where it says "example  
18 credit trending." I mean, you know, I read the  
19 basic text that's on the page.

20 Q. Well, on the right-hand side of the  
21 page, it tells you what you're going to get as  
22 part of the product, right?

23 A. Yes.

24 Q. Did you read that part?

25 A. Oh, yeah.

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1 Q. Oh okay. And then on the far right of  
2 each of those four categories, it says, says  
3 "learn more" but I'll represent to you it says  
4 "learn more." Okay?

5 A. It probably was cut off because this is  
6 one of those elongated pages that --

7 Q. Sure.

8 A. -- didn't want to print right.

9 Q. Do you recall, did you click on these  
10 "learn more" links to learn more about the  
11 characteristics of the product that you were  
12 about to buy?

13 A. I probably read all of this and then  
14 read -- clicked the "yes keep me informed"  
15 button.

16 Q. So, then is it your testimony that you  
17 did not click on the "learn more" links  
18 associated with each of the four categories of  
19 information?

20 A. No, that's not what I'm representing to  
21 you.

22 Q. Okay. That's my question, that's  
23 why --

24 A. I can't say that before I signed up for  
25 the product I clicked the "learn more" buttons.

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1 because I may not have. But I may have done so  
2 at a later date.

3 Q. Okay.

4 A. And so I may have a copy in here of the  
5 "learn more" and I may have actually read those  
6 pages.

7 Q. All right.

8 A. But I can't recall in what order I  
9 might have viewed that information, only that  
10 I've probably viewed every page that's out there  
11 on the TU site at some point in time or other  
12 now.

13 Q. The TU site?

14 A. The TU, TrueLink, whoever it is now.

15 Q. Okay. Well, I think it's important  
16 that we understand what site we're talking  
17 about, wouldn't you agree?

18 A. Well, as I sit here, it still says  
19 "TransUnion" at the top.

20 Q. Okay. Let me go back to the question I  
21 asked some time ago.

22 A. Okay.

23 Q. Do you know if you ever clicked on the  
24 "learn more" hyperlinks which is reflected on  
25 the first page of Exhibit 15?

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1 A. I couldn't answer that one way or the  
2 other.

3 Q. Okay. Because you don't know, right?

4 A. I don't know for sure, no. I could  
5 have and I also could not have.

6 Q. The top of the page says "Knowledge,  
7 protection, convenience." Do you see that,  
8 ma'am?

9 A. Yes.

10 Q. Says, "Knowledge, quarterly access to  
11 your credit report with the analytical tools,"  
12 right?

13 A. Yes.

14 Q. Okay. Did you read that?

15 MS. YBAGER: I'm so to interrupt.  
16 What page are we on?

17 MR. O'NEIL: First page.

18 THE WITNESS: We're on the first  
19 page.

20 A. Yes, I read that.

21 Q. (BY MR. O'NEIL) Okay. And then going  
22 down in the right-hand side, it describes your  
23 weekly fraud watch e-mails. I mean, that was  
24 the main thing that you were getting as part of  
25 the credit monitoring service, right?

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1 A. The main thing?

2 Q. Well, you know, that's a bad question,  
3 let me withdraw that. Do you see there it says,  
4 "Receive weekly e-mail alerts to changes in your  
5 report"?

6 A. Yes.

7 Q. And then below that it says,  
8 "Immediately find out about credit report  
9 changes, including fraudulent activity, etc."  
10 Do you see that?

11 A. Yes.

12 Q. When you read this, did you think to  
13 yourself, well, this is only going to tell us  
14 about changes to my husband's report and not  
15 about changes to Mr. Perez's report?

16 A. It says up here, "Complete identity  
17 theft protection with weekly fraud watch  
18 e-mails" at the very top.

19 Q. Could you just answer my question?

20 MR. O'NEIL: Let me go -- can the  
21 court reporter read back my question?

22 (Whereupon, the requested portion  
23 of the record was read by the reporter.)

24 A. No, I did not.

25 Q. (BY MR. O'NEIL) And did you believe on

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